

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CERTAIN UNDERWRITING MEMBERS AT
LLOYD'S OF LONDON,

Petitioner,

16-cv-323 (VSB)

v.

INSURANCE COMPANY OF THE
AMERICAS,

Respondent.

CERTAIN UNDERWRITING MEMBERS AT
LLOYD'S, LONDON SUBSCRIBING TO
TREATY NO. 0272/04,

Petitioner,

16-cv-374 (VSB)

v.

INSURANCE COMPANY OF THE
AMERICAS,

Respondent.

IPA ACQUISITIONS, INC.,

Petitioner,

NOTICE OF MOTION

v.

16-cv-323 (VSB)

GARY THORNLEY HIRST, INSURANCE
COMPANY of the AMERICAS, and
certain LLOYD'S SYNDICATES,
Respondents.

PLEASE TAKE NOTICE that upon the annexed Declaration of
Leighton R. Burns, dated August 10, 2016, the Affidavit of Sarah
Oddi, sworn to on August 10, 2016, the Declaration of Daniel L.
Hitzke, dated August 10, 2016, the Affidavit of Deborah Brahnham,
sworn to on August 10, 2016, and the affidavit of Fredrick Davis
sworn to on August 10, 2016, Petitioner IPA Acquisitions, Inc.
will move this Court, on a date set for the Court at the United

States Court House, for the Southern District of New York for the relief requested in the Petition.

Dated: August 10, 2016

s/ Leighton R. Burns

Leighton R. Burns, Esq.
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